

ORIGINAL

Approved: _____

ALEXANDER LI

Assistant United States Attorney

Before: THE HONORABLE JAMES L. COTT
United States Magistrate Judge
Southern District of New York

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:
UNITED STATES OF AMERICA :

SEALED COMPLAINT

- v. -

: Violations of 18
: U.S.C. §§ 1344 and 2

MILESH TALREJA,

Defendant.

: COUNTY OF OFFENSE:
: New York
:
----- X

SOUTHERN DISTRICT OF NEW YORK, ss.:

DAVID NIGRO, being duly sworn, deposes and says that he is a Special Agent with the United States Department of Homeland Security, Immigration and Customs Enforcement, Homeland Security Investigations ("HSI"), and charges as follows:

COUNT ONE

(Bank Fraud)

1. From at least on or about November 7, 2019 up to and including at least on or about November 14, 2019, in the Southern District of New York and elsewhere, MILESH TALREJA, the defendant, did execute and attempt to execute a scheme and artifice to defraud financial institutions, the deposits of which were then insured by the Federal Deposit Insurance Corporation, and to obtain moneys, funds, credits, assets, securities, and other property owned by, and under the custody and control of, such financial institutions, by means of false and fraudulent pretenses, representations, and promises, to wit, TALREJA deposited at a bank branch in Manhattan, New York, a \$500,000 check that was drawn upon a bank account containing approximately \$5,608.99, and thereafter withdrew and attempted to withdraw the fraudulently-deposited funds.

(Title 18, United States Code, Sections 1344 and 2.)

The bases for my knowledge and for the foregoing charges are, in part, as follows:

2. I am a Special Agent with HSI and have been for approximately three years. I have been personally involved in the investigation of this matter, and I base this affidavit on that participation, my conversations with other law enforcement agents and other individuals, my examination of reports and records, as well as my training and expertise. Because this affidavit is being submitted for the limited purpose of establishing probable cause, it does not include all the facts that I have learned during the course of the investigation. Where the contents of conversations of others are reported herein, they are reported in substance and in part.

3. Based on my discussions with other law enforcement agents, bank investigators, and other individuals, and my review of law enforcement records, bank records, and surveillance videos and stills, I have learned the following information, among other things:

a. On or about November 7, 2019, an individual I recognized from a passport photograph as MILESH TALREJA, the defendant, was recorded on surveillance video depositing a check (the "Check") at a national bank ("Bank-1") branch in Manhattan, New York.

b. TALREJA deposited the Check into an account ("Account-1") held in TALREJA's name at Bank-1. On or about November 6, 2019, the preceding day, Account-1 held a balance of approximately \$1,374.24.

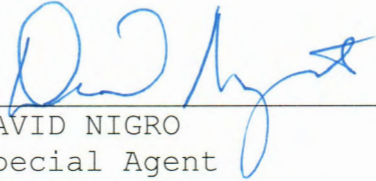
c. The Check was written in the amount of \$500,000 against an account ("Account-2") held in TALREJA's name at a national bank ("Bank-2") other than Bank-1. At the time of the deposit of the Check, Account-2 held a balance of approximately \$5,608.99.

d. On or about November 8, 2019, TALREJA made the following withdrawals, among others, from Account-1: (1) a \$100,000 transfer to another bank account held at Bank-1; (2) a \$5,000 wire transfer to Account-2; (3) three international wire transfers totalling \$30,261.47; (4) two checks totalling \$7,500; and (5) an ATM withdrawal of approximately \$100.

e. TALREJA continued to make withdrawals from Account-1 until at least on or about November 14, 2019.

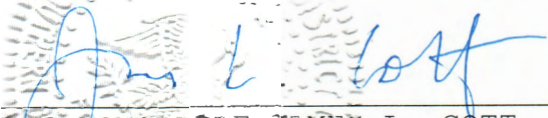
f. From at least on or about November 7, 2019 up to and including at least on or about November 14, 2019, Bank-1 and Bank-2 were insured by the Federal Deposit Insurance Corporation.

WHEREFORE, the deponent respectfully requests that a warrant issue for the arrest of MILESH TALREJA, the defendant, and that he be arrested and imprisoned, or bailed, as the case may be.



DAVID NIGRO
Special Agent
Homeland Security Investigations

Sworn to before me this
28th day of January 2020



THE HONORABLE JAMES L. COTT
United States Magistrate Judge
Southern District of New York